

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

**IN RE: JOHNSON & JOHNSON TALCUM
POWDER PRODUCTS MARKETING, SALES
PRACTICES, AND PRODUCTS LIABILITY
LITIGATION**

This applies to: **3:23-cv-12677**

Laura Ringel
v.
Johnson & Johnson, *et al.*

MDL NO. 3:16-MD-02738

**JUDGE MICHAEL A. SHIPP
MAG JUDGE RUKHSANAH
L. SINGH**

**MOTION FOR LEAVE TO AMEND NOTICE OF FILING AND CERTIFICATE OF
SERVICE**

Pursuant to Federal Rules of Civil Procedure, Rule 15, Plaintiff moves the Court for an Order granting her leave to amend her Notice of Filing in the above captioned action and, in support, states as follows:

1. “A party may amend its pleading only with the opposing party’s written consent or the court’s leave. The court should freely give leave when justice so requires.” Fed. R. Civ. P. 15(a)(2).
2. Plaintiff requests leave to amend the pleadings to conform them to raise an unpleaded issue.
3. Specifically, Plaintiff requests leave to amend their Notice of Filing and Certificate of Service to include the correct day on which the Short Form Complaint was filed to the court.

4. This case is not among the 1000 cases randomly selected for inclusion in the Court's bellwether discovery process. As discovery has not yet begun for this case, there is no prejudice in the allowance of this amendment.
5. The proposed Notice of Filing is attached as Exhibit A.
6. Plaintiff's counsel has not communicated with Defendant Johnson & Johnson seeking its assent to this motion.

Dated: September 26, 2023

Respectfully submitted,

/s/ Andrew F. Sullo
Andrew F. Sullo
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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on September 26, 2023 a copy of the foregoing MOTION FOR LEAVE TO FILE AMENDMENT OF NOTICE OF FILING AND CERTIFICATE OF SERVICE and [PROPOSED] ORDER were filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's system.

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Counsel for Plaintiff

Exhibit A

UNITED STATES DISTRICT COURT
DISTRICT OF NEWJERSEY

**IN RE JOHNSON&JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES PRACTICES,
AND PRODUCTS LIABILITY
LITIGATION**

THIS DOCUMENT RELATES TO:

Laura Ringel

v.

Johnson & Johnson, et al.

Case No.: 3:23-cv-12677

CIVIL NO.: 3:16-MD-2738-
MAS-RLS

JUDGE MICHAEL A.
SHIPP

MAG. RUKHSANAH L.
SINGH

AMENDED NOTICE OF FILING

Notice is hereby given pursuant the Case Management Order No. 3 (Filing of Short Form Complaints) that the Short Form Complaint and Jury Demand was filed on August 30, 2023 on behalf of Plaintiff Laura Ringel.

Dated: September 26, 2023

Respectfully Submitted by,

/s/ Andrew F. Sullo
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Counsel for Plaintiff

AMENDED CERTIFICATE OF SERVICE

I hereby certify that on September 26, 2023, a copy of the forgoing NOTICE OF FILING was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's system.

/s/ Andrew F. Sullo
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